

California Regional Water Quality Control Board

Los Angeles Region



Cal/EPA Secretary

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Arnold Schwarzenegger Governor

March 4, 2008

Ms. Cynthia Daniels City of Oxnard 1060 Pacific Avenue, Building 2 Oxnard, CA 93030

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES - FORMER JIM'S TEXACO STATION, 3025 SANTA CLARA AVENUE, OXNARD (ORDER NO. R4-2007-0019, SERIES NO. 049; CI NO. 9380)

Dear Ms. Daniels:

We have completed our review of your application for coverage under the General Waste Discharge Requirements to inject ORC at the site referenced above in Oxnard, California, for groundwater cleanup and remediation.

In 1992, four existing USTs were abandoned (three of the USTs were removed and one was abandoned in place) as a mini-mart building was constructed. Since then, various subsurface investigations have been conducted at the site, which consisted of drilling and sampling numerous soil borings, installing twenty one groundwater monitoring wells, and three vapor extraction wells (refer to Figures 2.5 and 2.6 for groundwater flow direction, groundwater plume delineation and groundwater monitoring well locations). Groundwater monitoring data collected in 2006 indicated that MTBE was detected at a maximum concentration of 2,600 micrograms per liter (ug/L) in MW2D near the storm drain, and in MW9B at a maximum concentration of 18 ua/L: both of which exceed the MCL of 5 µg/L. Well MW9B is located on the south side of Highway 101, near four active water supply wells.

To remediate residual groundwater contamination, a "Corrective Action Plan" dated March 30, 2007, by WorleyParsons Komex proposed to perform in-situ chemical oxidation (ISCO) at the site. ISCO is the process whereby an oxygen-releasing compound (ORC) is delivered to contaminated groundwater bearing zones in order to change the chemical form of a hazardous material to render it less toxic. The proposed compound is Sodium Persulfate under the trade name KlozürTM. An ISCO bench-scale testing is to be conducted in the laboratory to evaluate dose required to overcome natural organic matter (NOM), dose required for VOC destruction, and geochemical changes to groundwater bearing zones. An ISCO pilot-scale testing is to be conducted in the field (refer to Figure 4.1 for testing locations) subsequently to evaluate ability to deliver the desired volume of reagent within a reasonable length of time. The ISCO full-scale application for the treatment area identified in Figure 4.3 is to be conducted based on the results of both the bench-scale testing and pilot-scale testing. The treatment area is principally

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defined by the Property boundaries, extending into Santa Clara Avenue. The depth of the treatment zone extends to approximately 45 feet below ground surface (bgs).

A letter dated June 6, 2007 from Ventura County Division of Environmental Health (VCDEH) approved the Corrective Action. Regonal Board staff concurs with the locations of injection points in Figure 4.3

Regional Board staff has determined that the proposed discharge meets the conditions specified in Order No. R4-2007-0019, "Revised General Waste Discharge Requirements for Groundwater Remediation At Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Sites (General WDRs)," adopted by the State Water Resources Control Board on March 1, 2007.

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019 and Monitoring and Reporting Program No. CI-9380 and Standard Provisions. This Waste Discharge Requirements shall not be rescinded without the regulatory oversight agency's prior approval.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2007-0019. All monitoring reports shall be sent to the Regional Board, ATTN: Information Technology Unit.

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9380, which will assure that the reports are directed to the appropriate file and staff. Do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

We are sending a copy of Order No. R4-2007-0019 only to the applicant. A copy of the Order will be furnished to anyone who requests it, or on line at: http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf

If you have any questions, please contact Mr. Rod Nelson at (213) 576-6119.

Sincerely,

CC:

Tracy J. Egoscue Executive Officer

Enclosures: 1. Board Order No. R4-2007-0019

- 2. Standard Provisions for Reporting and Monitoring
- 3. Monitoring and Reporting Program No. CI-9380

Mr. David Salter, Ventura County Division of Environmental Health

Mr. Steve Winners, WorleyParsons Komex

California Environmental Protection Agency

STATE OF CALIFORNIA CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION MONITORING AND REPORTING PROGRAM NO. CI-9380 FOR

FORMER JIM'S TEXACO STATION
3025 SANTA CLARA AVENUE, OXNARD
(ORC INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 049)

REPORTING REQUIREMENTS

A. City of Oxnard (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for January-March 2008, shall be received at the Regional Board by April 15, 2008. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due
January – March	April 15
April – June July – September	July 15 October 15
October December	January 15

If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

- B. By March 1st of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall explain the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements (WDRs).
- C. Laboratory analyses all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.

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- D. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.
- E. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.
- F. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- G. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.
- H. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- I. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.
- J. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.

K. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. ORC INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

- 1. Location map showing injection points, used for the ORC (refer to attached Figure 2.5 for groundwater contour, Figure 2.6 for groundwater contaminant plume, and Figure 4.3 for the proposed injection locations).
- 2. Written and tabular summary defining the quantity of ORC injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total ORC delivered per injection point	grams/day		Quarterly

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from up-gradient area groundwater monitoring wells MW1A, MW1B, MW1C, MW3; source area groundwater monitoring wells MW1, MW2, MW3A, MW3B, MW6A, MW6B; and down-gradient area groundwater monitoring wells MW7A, MW7B, MW8A, MW8B (monitoring wells ending with different alphabetic designation are cluster wells completed at distinct depths) on a quarterly basis to monitor the effectiveness of the in-situ groundwater remediation. ORC injection points shall not be used as monitoring points. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS			
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	Quarterly ¹			
Benzene, Toluene, Ehylbenzene, Xylenes (BTEX)	µg/L	Grab	Quarterly ¹			

µg/L	Grab	• Quarterly ¹
μg/L	Grab	 Quarterly¹
mg/L	Grab	 Quarterly¹
milivolts		• Quarterly¹
un/l	Grab	 Quarterly¹
P9/-	Orab	
µg/L	Grab	 Quarterly¹
ua/L	Grab	Quarterly ¹
F97-		
pH units	Grab	Quarterly ¹
F/C	—Grab	-• Quarterly ¹
Feet, mean sea	In situ	 Quarterly¹
level and below		
ground surface		
	μg/L mg/L μg/L μg/L μg/L μg/L μg/L pH units F/ C Feet, mean sea level and below	μg/L Grab mg/L Grab μg/L Grab μg/L Grab μg/L Grab μg/L Grab β/β Grab β/β Grab pH units Grab β/β Grab F/β Grab Feet, mean sea In situle level and below

One week before injection and Quarterly thereafter

The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth quarterly sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored quarterly thereafter.

All groundwater monitoring reports must include, at a minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

IV. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Executive Officer if the Discharger makes a request and the Executive Officer USA Gasoline Corporation
Monitoring & Reporting Program No. CI-9380

determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

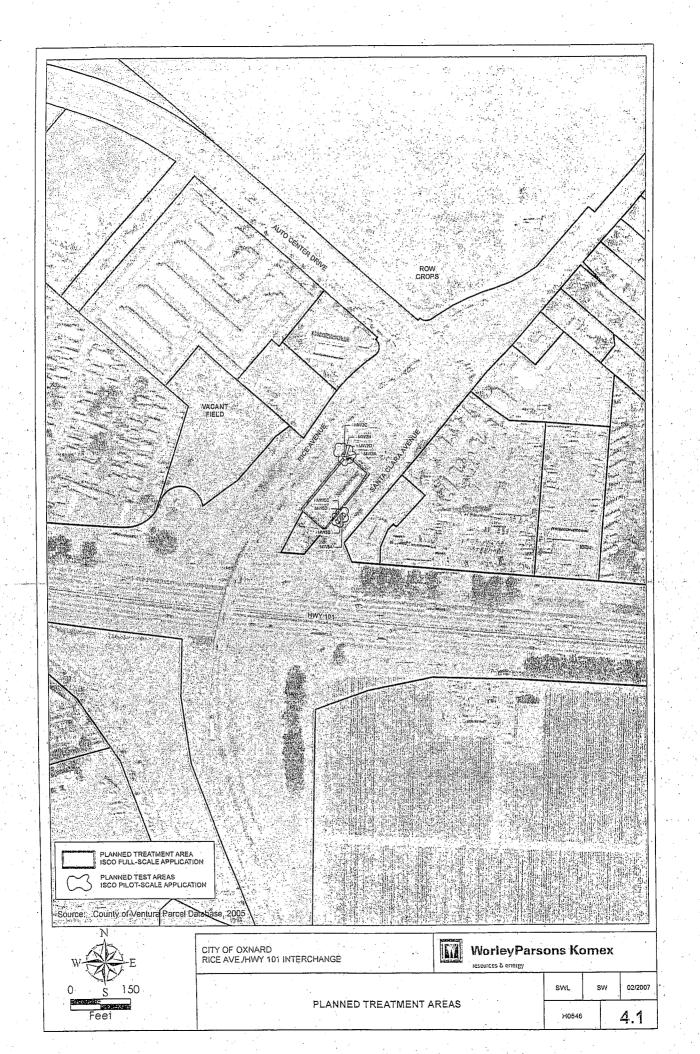
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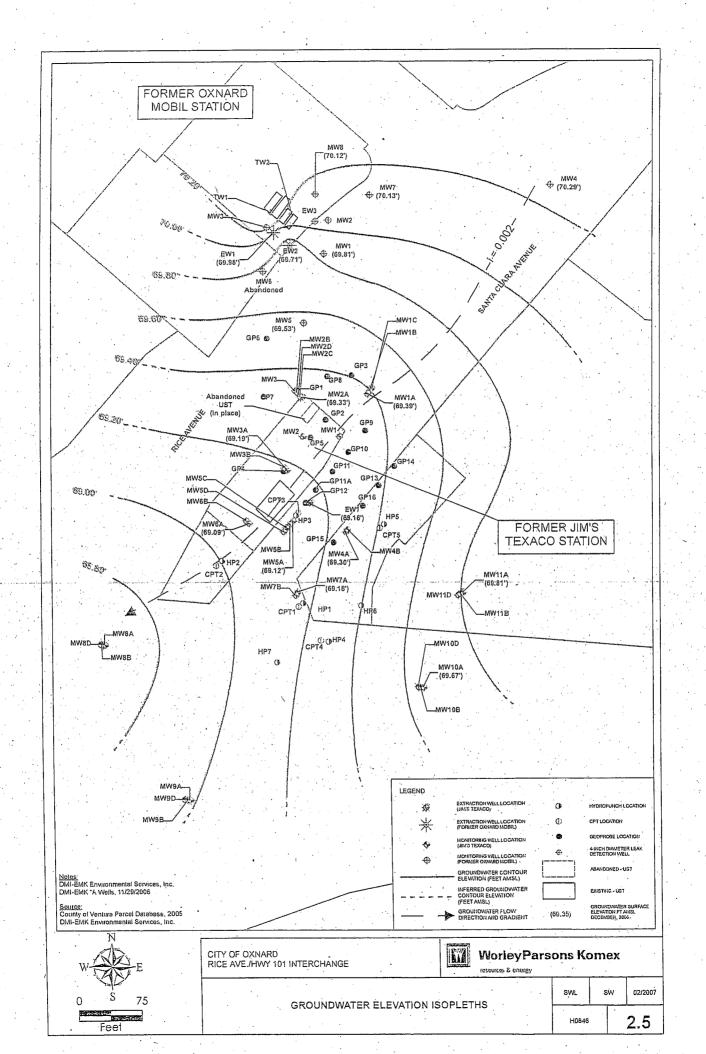
VI. PUBLIC DOCUMENTS

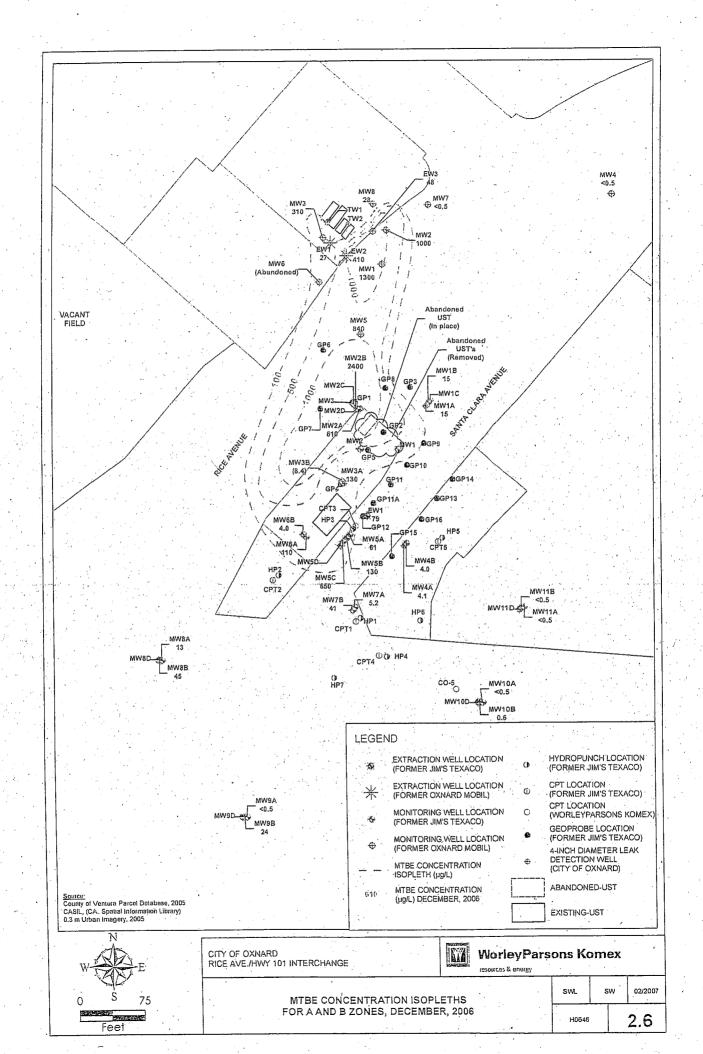
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

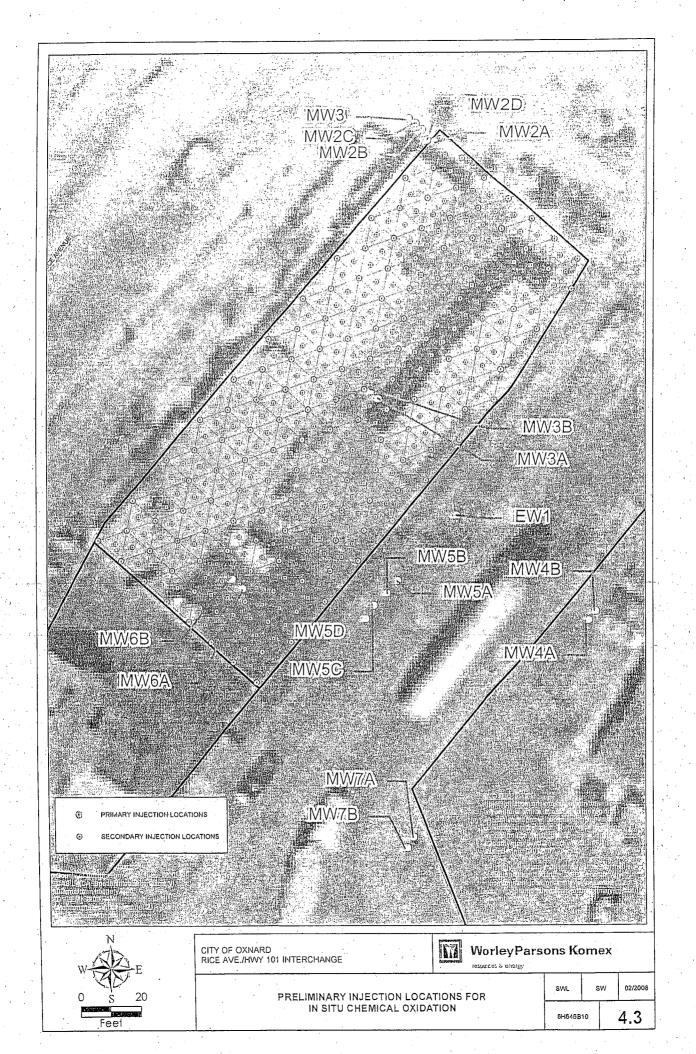
Ordered by:

Tracy J. Egoscue Executive Officer Date: March 4, 2008









STANDARD PROVISIONS APPLICABLE TO WASTE DISCHARGE REQUIREMENTS

1. DUTY TO COMPLY

The discharger must comply with all conditions of these waste discharge requirements. A responsible party has been designated in the Order for this project, and is legally bound to maintain the monitoring program and permit. Violations may result in enforcement actions, including Regional Board orders or court orders requiring corrective action or imposing civil monetary liability, or in modification or revocation of these waste discharge requirements by the Regional Board. [CWC Section 13261, 13263, 13265, 13268, 13300, 13301, 13304, 13340, 13350]

2. GENERAL PROHIBITION

Neither the treatment nor the discharge of waste shall create a pollution, contamination or nuisance, as defined by Section 13050 of the California Water Code (CWC). [H&SC Section 5411, CWC Section 13263]

3. AVAILABILITY

A copy of these waste discharge requirements shall be maintained at the discharge facility and be available at all times to operating personnel, [CWC Section 13263]

4. CHANGE IN OWNERSHIP

The discharger must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this Order's responsibility and coverage to a new discharger. The notice must include a written agreement between the existing and new discharger containing a specific date for the transfer of this Order's responsibility and coverage between the current discharger and the new discharger. This agreement shall include an acknowledgement that the existing discharger is liable for violations up to the transfer date and that the new discharger is liable from the transfer date on. [CWC Sections 13267 and 13263]

5 CHANGE IN DISCHARGE

In the event of a material change in the character, location, or volume of a discharge, the discharger shall file with this Regional Board a new Report of Waste Discharge: [CWC Section 13260(c)]. A material change includes, but is not limited to, the following:

(a) Addition of a major industrial waste discharge to a discharge of essentially domestic sewage, or the addition of a new process or product by an industrial facility resulting in a change in the character of the Waste.

Standard Provisions Applicable to Waste Discharge Requirements

10. OPERATION AND MAINTENANCE

The discharger shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the discharger to achieve compliance with conditions of this Order. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Order. [CWC Section 13263(f)]

11. HAZARDOUS RELEASES

Except for a discharge which is in compliance with these waste discharge requirements, any person who, without regard to intent or negligence, causes or permits any hazardous substance or sewage to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) that person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State toxic disaster contingency plan adopted pursuant to Article 3.7 (commencing with Section 8574.7) of Chapter 7 of Division 1 of Title 2 of the Government Code, and immediately notify the State Board or the appropriate Regional Board of the discharge. This provision does not require reporting of any discharge of less than a reportable quantity as provided for under subdivisions (f) and (g) of Section 13271 of the Water Code unless the discharger is in violation of a prohibition in the applicable Water Quality Control plan. [CWC Section 13271(a)]

12. PETROLEUM RELEASES

Except for a discharge which is in compliance with these waste discharge requirements, any person who without regard to intent or negligence, causes or permits any oil or petroleum product to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) such person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State oil spill contingency plan adopted pursuant to Article 3.5 (commencing with Section 8574.1) of Chapter 7 of Division 1 of Title 2 of the Government Code. This provision does not require reporting of any discharge of less than 42 gallons unless the discharge is also required to be reported pursuant to Section 311 of the Clean Water Act or the discharge is in violation of a prohibition in the applicable Water Quality Control Plan. [CWC Section 13272]

Standard Provisions Applicable to Waste Discharge Requirements

15. TREATMENT FAILURE

In an enforcement action, it shall not be a defense for the discharger that it would have been necessary to halt or to reduce the permitted activity in order to maintain compliance with this Order. Upon reduction, loss, or failure of the treatment facility, the discharger shall, to the extent necessary to maintain compliance with this Order, control production or all discharges, or both, until the facility is restored or an alternative method of treatment is provided. This provision applies, for example, when the primary source of power of the treatment facility fails, is reduced, or is lost. [CWC Section 13263(f)]

16. DISCHARGES TO NAVIGABLE WATERS

Any person discharging or proposing to discharge to navigable waters from a point source (except for discharge of dredged or fill material subject to Section 404 of the Clean Water Act and discharge subject to a general NPDES permit) must file an NPDES permit application with the Regional Board. [CCR Title 2 Section 22357]

17. ENDANGERMENT TO HEALTH AND ENVIRONMENT

The discharger shall report any noncompliance which may endanger health or the environment. Any such information shall be provided verbally to the Executive Officer within 24 hours from the time the discharger becomes aware of the circumstances. A written submission shall also be provided within five days of the time the discharger becomes aware of the circumstances. The written submission shall contain adescription of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected; the anticipated time it is expected to continue and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Executive officer, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours. The following occurrence(s) must be reported to the Executive Officer within 24 hours:

- (a) Any bypass from any portion of the treatment facility.
- (b) Any discharge of treated or untreated wastewater resulting from sewer line breaks, obstruction, surcharge or any other circumstances.
- (c) Any treatment plant upset which causes the effluent limitation of this Order to be exceeded. [CWC Sections 13263 and 13267]

18. MAINTENANCE OF RECORDS

The discharger shall retain records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used

Standard Provisions Applicable to Waste Discharge Requirements

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. [CWC Sections 13263, 13267, and 13268]"

20. OPERATOR CERTIFICATION

Supervisors and operators of municipal wastewater treatment plants and privately owned facilities regulated by the PUC, used in the treatment or reclamation of sewage and industrial waste shall possess a certificate of appropriate grade in accordance with Title-23, California Code of Regulations Section 3680. State Boards may accept experience in lieu of qualification training. In lieu of a properly certified wastewater treatment plant operator, the State Board may approve use of a water treatment plant operator of appropriate grade certified by the State Department of Health Services where reclamation is involved.

Each plant shall be operated and maintained in accordance with the operation and maintenance manual prepared by the municipality through the Clean Water Grant Program. [CWC Title 23, Section 2233(d)]

ADDITIONAL PROVISIONS APPLICABLE TO PUBLICLY OWNED TREATMENT WORKS' ADEQUATE CAPACITY

21. Whenever a publicly owned wastewater treatment plant will reach capacity within four years the discharger shall notify the Regional Board. A copy of such notification shall be sent to appropriate local elected officials, local permitting agencies and the press. The discharger must demonstrate that adequate steps are being taken to address the capacity problem. The discharger shall submit a technical report to the Regional Board showing flow volumes will be prevented from exceeding capacity, or how capacity will be increased, within 120 days after providing notification to the Regional Board, or within 120 days after receipt of notification from the Regional Board, of a finding that the treatment plant will reach capacity within four years. The time for filing the required technical report may be extended by the Regional Board. An extension of 30 days may be granted by the Executive Officer, and longer extensions may be granted by the Regional Board itself. [CCR Title 23, Section 2232]